

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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*In re* :  
THE FINANCIAL OVERSIGHT AND :  
MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA Title III  
as representative of : Case No. 17-BK-3283 (LTS)  
THE COMMONWEALTH OF PUERTO RICO, *et al.*, :  
Debtors.<sup>1</sup> : (Jointly Administered)  
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**INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL DEBT  
COALITION REGARDING ITS REQUEST TO BE HEARD AT THE  
MARCH 13-14, 2019 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)<sup>2</sup> submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of March 13-14, 2019, Omnibus Hearing* (Dkt. 5312) (the “Order”), and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

<sup>2</sup> The members of the LCDC are the following entities, either as beneficial holders or on behalf of managed funds and accounts: GoldenTree Asset Management LP; Monarch Alternative Capital LP ; Taconic Capital Advisors L.P.; and Whitebox Advisors, LLC.

1. Daniel Salinas and Eric Kay of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, plan to appear at the March 13-14 Hearing. Mr. Kay will appear in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007. Mr. Salinas will appear in the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

2. The LCDC does not plan to present argument on any scheduled matter at this time, but it reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the rights, claims, or interests of the LCDC.

DATED: March 8, 2019

Respectfully submitted,  
REICHARD & ESCALERA

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*Co-Counsel to the Lawful Constitutional Debt Coalition*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

/s/Carlos R. Rivera-Ortiz  
USDC-PR 303409